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*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)  
SIPA LIQUIDATION  
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

Adv. Pro No. 10-05128 (SMB)

JABA ASSOCIATES LP; ESTATE OF JAMES  
GOODMAN; AUDREY GOODMAN, in her  
capacity as a General Partner of JABA  
Associates LP and in her capacity as Personal  
Representative of the Estate of James Goodman;  
BRUCE GOODMAN, in his capacity as a General  
Partner of JABA Associates LP; and ANDREW  
GOODMAN, in his capacity as a General Partner of  
JABA Associates LP,

Defendants.

Plaintiff,

**NOTICE OF MOTION TO WITHDRAW THE REFERENCE**

**TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**PLEASE TAKE NOTICE** that Defendants JABA Associates LP; Estate of James Goodman; Audrey Goodman, in her capacity as a General Partner of JABA Associates LP and in her capacity as Personal Representative of the Estate of James Goodman; Bruce Goodman, in his capacity as a General Partner of JABA Associates LP; and Andrew Goodman, in his capacity as a General Partner of JABA Associates LP (“Defendants”), respectfully move the United States District Court for the Southern District of New York at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules for the Southern District of New York, for an Order withdrawing the reference of the above-captioned adversary proceeding from the United States Bankruptcy Court for the Southern District of New York for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: New York, New York  
May 15, 2020

**CHAITMAN LLP**

By: /s/ Helen Davis Chaitman  
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